

EXHIBIT 102
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of
MARYANNE RYAN taken pursuant to notice,
was held at BOIES SCHILLER FLEXNER LLP,
commencing May 24, 2023, 9:39 a.m., on
the above date, before Leslie Fagin, a
Court Reporter and Notary Public in the
State of New York.

MAGNA LEGAL SERVICES

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2 [REDACTED] 09:59:00

3 [REDACTED] 09:59:01

4 [REDACTED] 09:59:07

5 [REDACTED] 09:59:11

6 [REDACTED] 09:59:16

7 [REDACTED] 09:59:21

8 [REDACTED] 09:59:26

9 Q. In your experience working at the 09:59:29
10 bank, would 20 cash withdrawals be considered 09:59:30
11 unusual? 09:59:36

12 A. It all depends. 09:59:37

13 Q. What does it depend on? 09:59:39

14 A. The customer -- who the customer 09:59:41
15 is, what they were doing through the bank, 09:59:45
16 the dollar amounts of the transactions, the 09:59:47
17 overall value of somebody's account, how the 09:59:50
18 money came into the account, things such as 09:59:53
19 that. 09:59:55

20 Q. Is there anything else it might 09:59:56
21 depend on? 09:59:57

22 A. I'm sure there are other things 10:00:01
23 that once you start to look at the account 10:00:03
24 might prompt you to include other elements. 10:00:05

25 [REDACTED] 10:00:10

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2 [REDACTED] 10:01:22

3 [REDACTED] 10:01:25

4 [REDACTED] 10:01:26

5 [REDACTED] 10:01:28

6 [REDACTED] 10:01:34

7 [REDACTED] 10:01:40

8 [REDACTED] 10:01:43

9 [REDACTED] 10:01:45

10 [REDACTED] 10:01:50

11 [REDACTED] 10:01:53

12 [REDACTED] 10:01:56

13 [REDACTED] 10:01:59

14 [REDACTED] 10:02:00

15 Q. When a document [REDACTED] came 10:02:01

16 from the private bank, what would be the next 10:02:05

17 step for the investigation team? 10:02:09

18 A. We would look it over, and as long 10:02:11

19 as we were of the same opinion, we would file 10:02:15

20 the document as is -- almost as is, into a 10:02:19

21 SAR. 10:02:25

22 Q. Is it possible that the 10:02:27

23 investigation team would determine no SAR was 10:02:29

24 necessary? 10:02:32

25 A. Since we were charged with SAR 10:02:33

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2 have a requirement to discuss it with anyone 10:03:52

3 else at the bank, is that correct? 10:03:53

4 A. Correct. 10:03:55

5 Q. Is it possible despite not having a 10:03:56

6 requirement to do so, your team or the 10:03:59

7 investigation team may still discuss it with 10:04:01

8 others at the bank? 10:04:03

9 MR. KRAUSE: Objection. 10:04:05

10 A. The SAR decision lies solely with 10:04:06

11 the investigations department. Could an 10:04:11

12 employee under me have discussed it with 10:04:15

13 another person within investigations? Sure. 10:04:18

14 But they weren't going back to the 10:04:20

15 business to discuss the merits of SAR filing, 10:04:24

16 if that's what you are implying. 10:04:28

17 Q. Would you have ever discussed the 10:04:30

18 merits of a SAR filing with anyone outside of 10:04:32

19 the investigation team? 10:04:35

20 MR. KRAUSE: Objection. 10:04:37

21 A. I would discuss facts that might be 10:04:38

22 in a SAR, but I would not be discussing 10:04:42

23 whether or not to put it on the clock or not 10:04:44

24 put it on the clock. 10:04:46

25 Q. Was there anyone at JPMorgan who 10:04:48

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2 Q. Who is Mary Casey? 10:42:19

3 A. According to Jim, she was the 10:42:21

4 market manager. 10:42:23

5 Q. In the last sentence, it says, We 10:42:24

6 will revisit if the allegations turn into an 10:42:28

7 indictment. Is that right? 10:42:32

8 A. Correct. 10:42:33

9 Q. Is it your understanding that Jim 10:42:34

10 is reporting Mary Casey's determination or 10:42:40

11 making his own determination about that? 10:42:46

12 MR. KRAUSE: Objection. 10:42:48

13 A. I have no idea. 10:42:49

14 Q. Do you have a view why the bank 10:42:50

15 would wait until allegations turn into an 10:42:53

16 indictment before doing an update of the DDR? 10:42:57

17 MR. KRAUSE: Objection. 10:43:04

18 A. Can you repeat the question? 10:43:12

19 Q. Do you have a view as to why the 10:43:14

20 bank would wait to revisit the allegations 10:43:21

21 until they turn into an indictment? 10:43:27

22 MR. KRAUSE: Objection. 10:43:29

23 A. So there is too much unknown in 10:43:30

24 this sentence, the way it's written. I don't 10:43:47

25 know that -- whether or not the allegations 10:43:51

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2 were included in the last DDR since she knew 10:43:56
3 about it or not. 10:43:59

4 It is -- there is lots of things -- 10:44:08
5 lots of people that are in the news that 10:44:10
6 never go anywhere. So the fact that somebody 10:44:15
7 is waiting for it to solidify into an 10:44:18
8 indictment is not that unusual. 10:44:22

9 Q. Earlier you said, quote, That's the 10:44:34
10 forced timeline, but a banker can update his 10:44:38
11 profile of a customer at any point. End 10:44:41
12 quote. 10:44:44

13 Do you have a view why, given these 10:44:45
14 news articles, why the banker would not want 10:44:50
15 to update the profile sooner rather than 10:44:53
16 waiting for an indictment? 10:44:56

17 MR. KRAUSE: Objection. 10:44:58

18 A. I have never been in the banker's 10:45:00
19 role, so I don't know what he or she feels is 10:45:03
20 important to include or not include nor could 10:45:07
21 I tell from this sentence whether or not it 10:45:11
22 was or wasn't included in that last annual 10:45:14
23 DDR. 10:45:17

24 Q. Would an investigator ask a banker 10:45:18
25 why they're making that determination? 10:45:22

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2 [REDACTED] 11:22:33

3 [REDACTED] 11:22:35

4 [REDACTED] 11:22:35

5 [REDACTED] 11:22:38

6 [REDACTED] 11:22:41

7 [REDACTED] 11:22:45

8 [REDACTED] 11:22:48

9 [REDACTED] 11:22:53

10 [REDACTED] 11:22:54

11 [REDACTED] 11:22:57

12 Q. It was your understanding at that 11:23:01

13 time that Jeffrey Epstein was not using any 11:23:03

14 bank accounts or wire services in his 11:23:06

15 exploitation of women or children? 11:23:11

16 MR. KRAUSE: Objection. 11:23:14

17 A. If I had thought, I would have 11:23:16

18 acted on it. 11:23:18

19 Q. When Phil says, I hope -- sorry, he 11:23:19

20 doesn't say I -- he says, Hope that they do 11:23:28

21 not cave. 11:23:32

22 What did you understand that to 11:23:32

23 mean? 11:23:34

24 A. We were presenting to the business 11:23:37

25 to tee it back up again to make a decision on 11:23:41

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2 retention. So Phil was of the mindset, as 11:23:44

3 was I, that he had to go. 11:23:49

4 Q. Why did you think he had to go? 11:23:52

5 A. He was a reputational risk to the 11:23:57

6 bank. 11:24:00

7 Q. Why was it a reputational risk to 11:24:01

8 the bank? 11:24:04

9 A. Any client that would be 11:24:05

10 consistently in the news for any variety of 11:24:10

11 reasons would present reputational risk to 11:24:15

12 the bank. 11:24:18

13 Q. But in this particular instance, 11:24:18

14 what was the reputational risk to the bank? 11:24:20

15 A. There were allegations and there 11:24:23

16 was a conviction about improper behavior with 11:24:25

17 a minor. 11:24:30

18 Q. And at that time you believed those 11:24:35

19 allegations? 11:24:39

20 MR. KRAUSE: Objection. 11:24:41

21 A. I had no firsthand knowledge. I 11:24:45

22 was reading what I read in the paper, and I 11:24:47

23 thought it was disturbing enough that the 11:24:50

24 customer should be re-reviewed for exit 11:24:53

25 determination by JPMorgan. 11:24:57

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2 [REDACTED] 11:54:07
3 [REDACTED] 11:54:09
4 [REDACTED] 11:54:14
5 [REDACTED] 11:54:17
6 [REDACTED] 11:54:19
7 [REDACTED] 11:54:22
8 [REDACTED] 11:54:24
9 [REDACTED] 11:54:26
10 [REDACTED] 11:54:29
11 [REDACTED] 11:54:32
12 [REDACTED] 11:54:33
13 [REDACTED] 11:54:34
14 [REDACTED] 11:54:39
15 [REDACTED] 11:54:42
16 [REDACTED] 11:54:46

17 Q. But it is fair to say that at the 11:54:49
18 very least at this rapid response meeting 11:54:51
19 whether or not to keep Jeffrey Epstein as a 11:54:54
20 client was discussed, is that right? 11:54:56

21 A. That was the intention of the 11:54:59
22 discussion. 11:55:01

23 Q. Do you believe it is proper for a 11:55:02
24 banker to directly ask a client for facts 11:55:06
25 regarding an investigation into whether the 11:55:13

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2 Do you see that? 12:13:37

3 A. I do. 12:13:37

4 Q. Did you find it surprising that the 12:13:38

5 bank had extended a loan in relation to a 12:13:43

6 modeling agency that the DOJ appeared to be 12:13:50

7 investigating in relation to underage sex 12:13:56

8 trafficking? 12:14:02

9 MR. KRAUSE: Objection. 12:14:03

10 A. I needed to know more. It was the 12:14:04

11 first I was hearing of it, so I wanted to 12:14:07

12 understand more about M2. 12:14:14

13 Q. When you said, If girls were 12:14:19

14 exploited via their contract or arrangement 12:14:27

15 it would be hard for us to tell, what did you 12:14:30

16 mean by that? 12:14:39

17 A. If some girl signed on to a 12:14:41

18 modeling agency and was of the belief that 12:14:44

19 she was coming to America to do modeling and 12:14:48

20 that wasn't the case, we would not know 12:14:51

21 whether or not that was true or not. 12:14:55

22 Q. In 2011, did you believe the 12:14:59

23 allegations regarding the M2 modeling agency? 12:15:02

24 MR. KRAUSE: Objection. 12:15:05

25 A. I think I just heard about it. 12:15:06

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2 There was one article and I just heard about 12:15:08
3 it right there in that meeting that there was 12:15:11
4 a loan, that's all I knew. 12:15:13

5 Q. Once you learned more about the M2 12:15:15
6 modeling agency, did you form an opinion 12:15:18
7 about whether the allegations regarding 12:15:21
8 underage sex trafficking were true? 12:15:25

9 MR. KRAUSE: Objection. 12:15:28

10 A. Again, there was an article that 12:15:29
11 the DOJ was looking at it, that's all I knew. 12:15:32

12 [REDACTED] 12:15:37
13 [REDACTED] 12:15:40
14 [REDACTED] 12:15:44
15 [REDACTED] 12:15:52
16 [REDACTED] 12:15:56
17 [REDACTED] 12:15:56
18 [REDACTED] 12:16:00
19 [REDACTED] 12:16:02
20 [REDACTED] 12:16:05

21 Q. So you end this email by saying, 12:16:06
22 Bottom line, we need W to meet with Jes to 12:16:24
23 explain HT and then Jes can decide the next 12:16:27
24 steps. Typed on my BB, so sorry for typos. 12:16:33
25 I do have a PB rapid response memo I can 12:16:38

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2 know what -- I didn't know what Cutler knew 13:26:08

3 or didn't know about the bank's HT work. 13:26:10

4 Q. I'm just trying to understand why 13:26:16

5 you think Steve Cutler may feel differently, 13:26:21

6 [REDACTED] 13:26:26

7 [REDACTED] 13:26:30

8 [REDACTED] 13:26:33

9 [REDACTED] 13:26:37

10 MR. KRAUSE: Objection. Asked and 13:26:37

11 answered. 13:26:39

12 A. We were trying to get him out on 13:26:39

13 reputational risk reasons. Marrying together 13:26:44

14 the current work that the department was 13:26:49

15 doing, coupled with his old approval would 13:26:54

16 have given him a complete picture to 13:26:57

17 reapprove or relook at whether or not he was 13:27:00

18 still comfortable. 13:27:02

19 Q. You then write, I circled back with 13:27:04

20 PB and that was the reason for the RR meeting 13:27:07

21 on Friday. Seems -- no, let's stop there. 13:27:12

22 I will restate that. You write, I 13:27:19

23 circled back with PB and that was the reason 13:27:21

24 for the RR meeting on Friday. 13:27:23

25 Do you see that? 13:27:26

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2 that if it were up to them, they would have 13:31:13

3 terminated their relationship with Jeffrey 13:31:16

4 Epstein? 13:31:19

5 MR. WOHLGEMUTH: Objection. 13:31:19

6 A. I don't recall anything specific 13:31:21

7 said. 13:31:24

8 Q. You then write, Digging will take a 13:31:35

9 few days, I will get back to you when I am 13:31:38

10 done. The guy likes cash so the paper trail 13:31:40

11 could be hard. 13:31:48

12 Do you see that? 13:31:50

13 A. I do. 13:31:50

14 Q. What did you mean when you said, 13:31:50

15 the guy likes cash so the paper trail could 13:31:53

16 be hard? 13:31:56

17 A. As I recall, there were not credit 13:32:01

18 cards activity so I couldn't place people in 13:32:10

19 places at a certain time which is something 13:32:16

20 we might look at credit card data for because 13:32:18

21 paid -- he took out a lot of cash. 13:32:22

22 [REDACTED] 13:32:25

23 [REDACTED] 13:32:29

24 [REDACTED] 13:32:33

25 [REDACTED] 13:32:34

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2 [REDACTED] 13:32:36

3 [REDACTED] 13:32:39

4 [REDACTED] 13:32:42

5 [REDACTED] 13:32:43

6 [REDACTED] 13:32:44

7 [REDACTED] 13:32:47

8 [REDACTED] 13:32:49

9 [REDACTED] 13:32:53

10 [REDACTED] 13:32:56

11 MR. LAW: This will be Exhibit 10, 13:33:41

12 Bates number JPM-SDNYLIT-W-00021929. 13:33:43

13 (Ryan Exhibit 10, Email Chain, 13:33:54

14 marked for identification.) 13:33:54

15 THE WITNESS: Okay. 13:34:59

16 [REDACTED] 13:35:00

17 [REDACTED] 13:35:03

18 [REDACTED] 13:35:07

19 [REDACTED] 13:35:12

20 [REDACTED] 13:35:13

21 [REDACTED] 13:35:14

22 [REDACTED] 13:35:19

23 [REDACTED] 13:35:27

24 [REDACTED] 13:35:30

25 [REDACTED] 13:35:30

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2 [REDACTED] 13:41:44
3 [REDACTED] 13:41:46
4 [REDACTED] 13:41:50
5 [REDACTED] 13:41:51
6 [REDACTED] 13:41:55
7 [REDACTED] 13:41:58
8 [REDACTED] 13:42:02
9 [REDACTED] 13:42:05
10 [REDACTED] 13:42:10
11 [REDACTED] 13:42:15
12 [REDACTED] 13:42:18
13 [REDACTED] 13:42:21
14 [REDACTED] 13:42:21
15 [REDACTED] 13:42:24
16 [REDACTED] 13:42:27
17 [REDACTED] 13:42:30
18 [REDACTED] 13:42:34

19 MR. LAW: This is Exhibit 11, Bates 13:43:13
20 number JPM-SDNYLIT-00194154. 13:43:16

21 (Ryan Exhibit 11, Email, marked for 13:43:24
22 identification.) 13:43:47

23 THE WITNESS: Okay. 13:43:47

24 Q. This is an email from you, Maryanne 13:43:48
25 Ryan, to Phillip DeLuca on November 29, 2011, 13:43:53

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2		16:13:17
3		16:13:19
4		16:13:22
5		16:13:26
6		16:13:30
7		16:13:34
8		16:13:37
9		16:13:45
10		16:13:48
11		16:13:52
12		16:13:58
13		16:14:01
14		16:14:03
15		16:14:05
16		16:14:10
17		16:14:14
18		16:14:18
19		16:14:23
20		16:14:27
21		16:14:34
22		16:14:40
23		16:14:43
24		16:14:45
25		16:14:48

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2		16:14:51
3		16:14:54
4		16:15:00
5		16:15:05
6		16:15:08
7		16:15:15
8		16:15:23
9		16:15:23
10		16:15:26
11		16:15:30
12		16:15:32
13		16:15:35
14		16:15:39
15		16:15:40
16		16:15:42
17		16:15:45
18		16:15:51
19		16:15:56
20		16:15:59
21		16:16:01
22		16:16:02
23		16:16:05
24		16:16:08
25		16:16:10

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2		16:23:14
3		16:23:15
4		16:23:17
5		16:23:22
6		16:23:25
7		16:23:28
8		16:23:30
9		16:23:31
10		16:23:34
11		16:23:39
12		16:23:42
13		16:23:45
14		16:23:47
15		16:23:47
16		16:23:47
17		16:23:56
18		16:24:01
19		16:24:08
20		16:24:11
21		16:24:15
22		16:24:18
23		16:24:23
24		16:24:23
25		16:24:27

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2		16:24:30
3		16:24:32
4		16:24:34
5		16:24:38
6		16:24:42
7		16:24:45
8		16:24:47
9		16:24:51
10		16:24:54
11		16:24:58
12		16:25:01
13		16:25:04
14		16:25:08
15		16:25:11
16		16:25:15
17		16:25:16
18		16:25:21
19		16:25:27
20		16:25:29
21		16:25:42
22		16:25:46
23		16:25:49
24		16:25:54
25		16:25:59

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2 to MC2 Models Management LLC. 16:46:17

3 Do you see that? 16:46:23

4 A. I do. 16:46:23

5 Q. Did you find it unusual that the 16:46:24

6 bank had issued a million dollars letter of 16:46:27

7 credit to Jeffrey Epstein to backstop a loan 16:46:32

8 of a model management company that was 16:46:37

9 publicly alleged to facilitate underage sex 16:46:42

10 trafficking? 16:46:48

11 MR. KRAUSE: Objection. 16:46:49

12 A. As a standby letter of credit, it's 16:46:53

13 a backstop. So we were guaranteeing the 16:46:58

14 million -- or Jeffrey Epstein was 16:47:03

15 guaranteeing the million dollars if something 16:47:04

16 went wrong with the Mellon loan. 16:47:06

17 Q. The next email up, Paul Morris 16:47:11

18 writes, Jim, FYI, expires in April. I 16:47:15

19 believe this has been extended for a year 16:47:19

20 each of the last two years. Let me know if 16:47:22

21 you want to discuss. Thanks. 16:47:25

22 Do you see that? 16:47:26

23 A. I do. 16:47:26

24 Q. Do you know if that loan was 16:47:27

25 extended in April of 2011? 16:47:29

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2 A. I do not know. 16:47:36

3 Q. Would you have been surprised if 16:47:37

4 the loan was extended in April of 2011 given 16:47:39

5 the public allegations regarding MC2 Models 16:47:42

6 Management LLC? 16:47:47

7 MR. KRAUSE: Objection. 16:47:48

8 A. There was an article about MC2, 16:47:49

9 yes. But MC2 Model Management, LLC, the same 16:47:57

10 entity, or -- I don't know if it's the exact 16:48:04

11 same entity. But I don't know -- it's a 16:48:07

12 backstop loan that was never called upon. So 16:48:12

13 I don't know what goes into making a credit 16:48:20

14 decision of pure exit or if there are strings 16:48:22

15 attached to it. 16:48:26

16 Q. Would it strike you as unusual for 16:48:27

17 the bank to offer credit to a client to 16:48:29

18 backstop a loan for a company that has 16:48:35

19 publicly been alleged to facilitate underage 16:48:39

20 sex trafficking? 16:48:42

21 MR. KRAUSE: Objection. 16:48:44

22 A. I would hope that in the annual 16:48:45

23 review that fact would have come out and 16:48:53

24 might have stopped them from renewing the 16:48:56

25 loan. 16:48:58

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2 Q. When you say some other interesting 17:09:09
3 finds but no smoking guns were. 17:09:13

4 Do you see that? 17:09:16

5 A. Yes. 17:09:16

6 Q. What did you mean by, other 17:09:17
7 interesting finds? 17:09:23

8 MR. KRAUSE: Objection. 17:09:28

9 A. Just other things I noticed that I 17:09:29
10 was including so he could have other facts 17:09:32
11 when he went to speak to Jes. 17:09:42

12 Q. What was interesting about these 17:09:44
13 finds? 17:09:47

14 A. I mean he sponsored other customers 17:09:51
15 to the bank, saw different payments, no huge 17:10:08
16 amounts. I referred to him as a sugar daddy. 17:10:14
17 His foundation began paying donations to the 17:10:19
18 Palm Beach police department down in Florida, 17:10:26
19 around -- as reported, just before the case 17:10:31
20 started; paid other monies to different 17:10:33
21 schools, nothing -- no astronomical payments. 17:10:36

22 And I noticed that his business 17:10:41
23 account, I saw no credits and debits to 17:10:43
24 particular investors of his. He sent a lot 17:10:48
25 of money to his local Palm Beach bank 17:10:54

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2 account. 17:11:00

3 Q. So those were the finds, correct? 17:11:00

4 A. Correct. 17:11:05

5 Q. What was interesting about those 17:11:05

6 finds? 17:11:08

7 A. Just terminology I applied to it. 17:11:10

8 Nothing -- nothing underhanded about, I just 17:11:14

9 thought they were things I told William as he 17:11:20

10 prepared for that meeting. 17:11:22

11 [REDACTED] 17:11:23

12 [REDACTED] why do you 17:11:26

13 think you needed to tell William about these 17:11:29

14 finds? 17:11:33

15 MR. KRAUSE: Objection. 17:11:35

16 A. He was meeting with Jes about 17:11:37

17 retaining Epstein as a customer. So there 17:11:39

18 were different facts that I thought I should 17:11:44

19 pass on to William beforehand. 17:11:46

20 Q. So for example, if we look at No. 17:11:52

21 2, where you say, His foundation account did 17:11:57

22 pay donations to the Palm Beach police 17:11:59

23 department as reported just before the case 17:12:02

24 started, this same foundation account did pay 17:12:04

25 monies direct to models and payments direct 17:12:08

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2 to specialty schools (massage, culinary) and 17:12:11

3 universities on behalf of models/aspiring 17:12:19

4 actresses, nothing was astronomical. 17:12:24

5 Do you see that? 17:12:29

6 A. I do. 17:12:29

7 Q. Were you aware in 2011 that Jeffrey 17:12:29

8 Epstein was alleged to commit sexual 17:12:37

9 misconduct in relation to massages? 17:12:42

10 A. I don't know when I became aware of 17:12:53

11 certain things. There has been so much press 17:12:57

12 that -- throughout the years, I can't speak 17:13:00

13 to exact moment that I heard about different 17:13:03

14 allegations. 17:13:07

15 Q. Were you aware in 2011 that Jeffrey 17:13:08

16 Epstein's sexual misconduct often involved 17:13:17

17 models and aspiring actresses? 17:13:23

18 MR. KRAUSE: Objection. 17:13:28

19 A. I don't -- I don't recall what I 17:13:29

20 read or didn't read about the people he 17:13:35

21 associated to. 17:13:38

22 [REDACTED] 17:13:40

23 [REDACTED] 17:13:44

24 [REDACTED] 17:13:47

25 [REDACTED] 17:13:52

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2		17:13:55
3		17:13:57
4		17:14:00
5		17:14:03
6		17:14:08
7		17:14:12
8		17:14:16
9		17:14:19
10		17:14:22
11		17:14:28
12		17:14:32
13		17:14:36
14		17:14:39
15		17:14:42
16		17:14:43
17		17:14:44
18		17:14:46
19		17:14:50
20		17:14:53
21		17:14:55
22		17:14:59
23		17:15:01
24		17:15:04
25		17:15:07

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2 [REDACTED] 17:15:09

3 [REDACTED] 17:15:10

4 [REDACTED] 17:15:16

5 [REDACTED] 17:15:19

6 [REDACTED] 17:15:23

7 [REDACTED] 17:15:33

8 [REDACTED] 17:15:37

9 [REDACTED] 17:15:41

10 [REDACTED] 17:15:43

11 [REDACTED] 17:15:46

12 Q. In the previous find you call 17:15:55

13 Jeffrey Epstein a sugar daddy. 17:15:58

14 Do you see that? 17:16:03

15 A. I do. 17:16:03

16 Q. What does that mean? 17:16:03

17 A. Somebody that likes to spend his 17:16:04

18 money on ladies. 17:16:08

19 Q. Does the term sugar daddy, in your 17:16:15

20 view, imply financial support in exchange for 17:16:19

21 sexual favors? 17:16:25

22 A. No, it does not. 17:16:26

23 Q. Did you find it unusual that he 17:16:32

24 spends, quote, a good deal at spa 17:16:36

25 establishments, end quote? 17:16:39

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2 A. They spent, he didn't spend. 17:16:50

3 Q. Did you find it unusual that they 17:16:59

4 spent a good deal at spa establishments? 17:17:02

5 A. No. 17:17:08

6 Q. Looking at the beginning of find 17:17:25

7 No. 1, you say, the opening of DDA accounts 17:17:27

8 and a CC for two 18-year-olds turned 19 days 17:17:32

9 later, that appear to be part of his inner 17:17:39

10 entourage. One is mentioned in many of the 17:17:43

11 recaps of the escapades as a willing 17:17:45

12 participant and assistant when hosting 17:17:48

13 visitors. She has received about 450,000 17:17:50

14 since opening from Epstein. 17:17:53

15 Do you see that? 17:17:56

16 A. I do. 17:17:56

17 Q. Did you find it unusual that a man 17:17:57

18 over 50 years old was opening accounts for 17:18:02

19 18-year-old women who were not his relatives? 17:18:09

20 A. If they were significant other to 17:18:18

21 him, no, I would not have found that unusual. 17:18:21

22 Q. Did you find it unusual that a 17:18:25

23 willing participant of the escapades was paid 17:18:30

24 450,000 from Epstein? 17:18:37

25 A. I'm not sure which article this is 17:18:46

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2 referring to. The way -- the way I phrased 17:18:51
3 it, if we are referring to that person 17:18:54
4 earlier that I looked at, that was in another 17:18:57
5 email, if -- I thought she was his 17:19:01
6 significant other and she was routinely 17:19:09
7 gifted money from Epstein and had her own 17:19:11
8 account with her own credit card, which had 17:19:15
9 no strings; meaning he didn't control it. 17:19:17
10 She came and went with the banker however she 17:19:20
11 would see fit, that did not appear that 17:19:22
12 unusual to me. 17:19:26

13 Q. If you learned that she was not his 17:19:27
14 significant other, would it have appeared 17:19:29
15 unusual to you? 17:19:33

16 A. I would have found it very unusual 17:19:33
17 that he would have sponsored somebody for the 17:19:36
18 private bank to independently operate if -- 17:19:38
19 that would not fit a fact pattern of somebody 17:19:46
20 that was controlling somebody to me. 17:19:50

21 Q. Are you aware of anyone at the bank 17:19:52
22 asking Jeffrey Epstein whether these women 17:19:56
23 were his significant others? 17:20:00

24 A. I am not aware of what led to the 17:20:04
25 opening of these accounts. 17:20:08

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2 [REDACTED] 18:23:07
3 [REDACTED] 18:23:09
4 [REDACTED] 18:23:12
5 [REDACTED] 18:23:16
6 [REDACTED] 18:23:20
7 [REDACTED] 18:23:20
8 [REDACTED] 18:23:23
9 [REDACTED] 18:23:27
10 [REDACTED] 18:23:29
11 [REDACTED] 18:23:34
12 [REDACTED] 18:23:36
13 [REDACTED] 18:23:47
14 [REDACTED] 18:23:57
15 [REDACTED] 18:23:59
16 [REDACTED] 18:24:04
17 [REDACTED] 18:24:06

18 Q. So I do want to ask you a little 18:24:08
19 about Mr. DeLuca's statement. 18:24:10

20 As you just testified, he responds 18:24:12
21 to your email about the large cash 18:24:15
22 withdrawals not stopping, and he said 18:24:17
23 shouldn't the business have been telling us 18:24:20
24 this, correct? 18:24:22

25 A. That's what he wrote. 18:24:23